

### REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-6, 8-17, 19-28, and 30-34 are pending in this application, Claims 1, 12, 23, and 34 having been amended by the present amendment. Support for amended Claims 1, 12, 23, and 34 can be found, for example, in the original claims, drawings, and specification as originally filed. No new matter has been added.

In the outstanding Office Action, Claims 1, 12, 23, and 34 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee et al. (U.S. Patent No. 7,047,535; hereinafter “Lee”) in view of Pace et al. (U.S. Patent No. 7,047,535, hereinafter “Pace”) and further in view of Coveley et al. (U.S. Patent No. 6,873,620; hereinafter “Coveley”); Claims 2, 3, 13, 14, 24, and 25 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Pace and Coveley further in view Lam et al. (U.S. Patent No. 5,926,636; hereinafter “Lam”); Claims 4, 15, and 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Pace and Coveley further in view of Nakamura et al. (U.S. Patent No. 5,987,529; hereinafter “Nakamura”); and Claims 8-11, 19-22, and 30-33 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Pace, Coveley, and further in view of Hamilton et al. (U.S. Publication No. 2003/0177283; hereinafter “Hamilton”).

Initially, Applicants respectfully request that the 2002-82806 reference cited in the Information Disclosure Statement filed November 4, 2003 be acknowledged as having been considered in the next Office Action.

In response to the rejections under 35 U.S.C. § 103(a), Applicants respectfully submit that amended independent Claim 1 recites novel features clearly not taught or rendered obvious by the applied references.

Amended independent Claim 1 is directed to an image forming apparatus including,  
*inter alia*:

... hardware resources used for image formation, an application for performing processes on image formation, and a platform that exists between the application and the hardware resources, the platform including an operating system and at least one control service to control an execution of each requested process of the hardware resources according to a function call from the application, wherein interprocess communication is performed between the control service and the application, and the **hardware resources include at least a printer and a scanner**, the image forming apparatus comprising:

a virtual application service that is provided between the application and the platform, the virtual application service is configured to operate as a client process for the control service and to operate as a server process for the application, and

a wrapping part configured to convert a function called by the application, and perform a function call to the control service by using the converted function, wherein the wrapping part is included in the virtual application service.

Independent Claims 12, 23, and 34 recite substantially similar features as Claim 1.

Thus, the arguments presented below with respect to Claim 1 are also applicable to independent Claims 12, 23, and 34.

Page 3 of the outstanding Office Action acknowledges that Lee “does not explicitly teach image, a platform that exists between the application and the hardware resources, the platform including an operating system and at least one control service to control an execution of each requested process of the hardware resources.” However, page 3 of the outstanding Office Action asserts that Pace describes the claimed platform including an operating system and at least one control service to control an execution of each requested process of the hardware resources by asserting that Pace describes a general middleware computer system 160 with well-known computer hardware 100.

However, Applicants respectfully submit that Pace fails to teach or suggest the claimed platform including the control service to control an execution of each requested process of the hardware resources that *includes at least the printer and the scanner*. In Pace, the well-known computer hardware 100 does not include hardware resources including at least a printer and a scanner.

As to Applicants' claimed control service, the outstanding Office Action seems to assert that the middleware platform 104 (Microsoft Commerce Server) corresponds to the claimed control service to control an execution of each requested process of the hardware resources. However, according to Wikipedia, "the latest edition of Commerce Server (2007) is designed around 4 main blocks of functionality (discussed below). A typical application will orchestrate these functions as an application that enhances the typical experience for shoppers, web developers, merchants, system administrators and other information technology professionals. Commerce Server also facilitates the processes involved with building and managing an online commercial presence for each through a set of auxiliary tools aimed at a specific audience." Applicants respectfully submit that the middleware platform 104 and Commerce Server do not correspond to the claimed control service, as it is not described that the middleware platform 104 and Commerce Server control an execution of each requested process of hardware resources which include a printer and a scanner.

Thus, Applicants respectfully submit that amended independent Claims 1, 12, 23, and 34 (and all claims depending thereon) patentably distinguish over Lee. Further, Applicants respectfully submit that Lam, Nakamura, Pace, Coveley, and Hamilton fail to cure any of the above-noted deficiencies of Lee.

Accordingly, Applicants respectfully request the rejections under 35 U.S.C. § 103(a) be withdrawn.

Consequently, in view of the present amendment, and in light of the above discussion, the pending claims as presented herewith are believed to be in condition for formal allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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